

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

IN RE: BAIR HUGGER FORCED AIR MDL No.: 15-md-02666 (JNE/DTS)
WARMING PRODUCT LIABILITY
LITIGATION

This Document Relates To:

Brenda L. Dollard vs. 3M Company, et al,
Civ. No. 0:18-cv-00776 (JNE/FLN)

DECLARATION OF AMBER M. PANG PARRA
IN SUPPORT OF PLAINTIFF'S RESPONSE
TO DEFENDANTS' MOTION TO DISMISS

I, Amber Marie Seu Ying Pang Parra, , declare as follows:

1. I am an attorney at Justinian & Associates PLLC.
2. I submit this affidavit in opposition to Defendants' Motion to Dismiss for Failure to Comply with Pretrial Order No. 23 [Dkt. 1740] filed on February 7, 2019.
3. Ms. Lawlary contacted our firm regarding injuries that were allegedly caused by the Bair Hugger patient warming device.
4. Certain medical records and billing records pertaining to Ms. Dollard's treatment were obtained by Amber M. Pang Parra. Those records indicated that a Bair Hugger device was used during Ms. Dollard index orthopedic surgery.
5. Counsel worked with Ms. Dollard to complete the plaintiff fact sheet ("PFS").
6. A completed PFS, with signed authorization and verification forms were submitted

May 27, 2018, via online portal

7. After not hearing from Ms. Dollard despite attempts at contact including phone calls and update letters, Counsel performed an online search seeking updated contact information. Counsel discovered an obituary for a Brenda Louise Dollard sometime in November 2018.
8. Counsel made additional attempts to contact Ms. Dollard, determine whether the obituary found belonged to her, and tried to locate next of kin.
9. As these efforts to contact Ms. Dollard or any next of kin have not been successful to date, Counsel has been unable to confirm that Ms. Dollard has passed. Counsel has not been able to locate any next of kin to determine whether the appropriate person would want to substitute into this matter and pursue Ms. Dollard's claims.

Pursuant to 28 U.S.C. § 1746(2), I declare under penalty of perjury that the foregoing is true and correct.

Dated: February 14, 2019

/s/Amber M. Pang Parra
Amber M. Pang Parra

